

Establishment of Restricted Area 2503D, Camp Pendleton; CA

While acknowledging that realistic military training is important, I consider establishment of the proposed restricted airspace to be insufficiently justified, and further, an unreasonable hardship and obstacle to safety for General Aviation.

1. Many pilots who would be impacted by the change are not aware of the proposal due to insufficient notification. The name and address of every pilot and aircraft owner in the nation are readily available to anyone. Direct notification of pilots, especially in Southern California, is reasonable and proper. No one charged with the responsibility of evaluating the merits of this proposal can consider the job of making this issue visible and of receiving public comment satisfactorily accomplished. Sorry, but that's the truth.

2. Navigation would be severely and negatively impacted. Safety will be compromised on a daily basis. Many, many pilot's would have to fly further out to sea, or be concentrated into a corridor bounded by high, rugged terrain in order to transition the between Los Angeles and San Diego areas.

3. VFR flight planning would be come more difficult. Any prudent, advanced flight planning would have to avoid the restricted area. Restricted areas are essentially no-fly zones for VFR flight planning. This means that arguments about a small number of active days are irrelevant. One cannot assume that they will *probably* be given permission to fly through the restricted area. Having once made a plan, pilots are trained to stick to it.

4. To jet aircraft the restricted area is very small. Usage of the restricted area that spills outside will pose a greater hazard to civilian aircraft than the current MOA structure. All pilots, civilian and military, must behave as if the airspace is shared. Just because there aren't any civilian airplanes inside the restricted area, doesn't mean they're out of harms way. This can only detract from training realism and provide fertile ground for misjudgment and hazard to all.

5. The technical definition of the boundaries is vague. Boundaries do not fall cleanly on VOR radials. This makes in necessary for GA aircraft to provide extra clearance when navigating, especially as they transition around the area out over the ocean.

6 Oceanside VORTAC is severely impacted along with instrument approaches for Carlsbad. These issues are not acknowledged in the proposal.

7. 11,000 feet is just too high. Over flight by aircraft transitioning the southern coastal area, originating from north of LAX class B and from airports to the south of LAX, including Hawthorne, Compton, Torrance, Long Beach, Fullerton, and Santa Ana, etc., will be forced to make unreasonable climbs and descents if they are to over fly the restricted area enroute to the San Diego Area. The same is true for aircraft originating in the San Diego area for flights northward. The proposal does not address the profiles that would be required for typical flights.

8. Anyone with their ear to the ground knows that there is a contest going on regarding the possible re-location of San Diego's international airport to an

area that would impinge on Camp Pendleton. That brings politics into the picture. Revising airspace boundaries for the purpose of gaining political leverage is unacceptable. It is the duty of the FAA to bring this to light and act appropriately.

9. There is an unbelievable amount of airspace in the southwest set aside for military training. The majority of the Channel Islands are at the disposal of the military. The notion of needing exclusive control of this particular coastal airspace for live fire exercises and training is highly dubious given the presence of Interstate 5. Surely, if the United States Marines need to do live fire training, amphibious assaults and landings, they will find suitable coastal terrain and airspace that is already allocated to them or to another department. This must be clearly spelled out. It isn't. This leaves no publicly visible justification for the proposal.

To those involved, please don't succumb to political influence and favoritism. It's becoming more and more fashionable for entities to try to obtain control of airspace. The airspace along California's coastline belongs to everyone.

Richard Howell
Aliso Viejo, California